

Jonathan Shub (SBN 237708)
jshub@seegerweiss.com
SEEGER WEISS LLP
1515 Market Street, Suite 1380
Philadelphia, PA 19102
Telephone: (215) 564-2300
Facsimile: (215) 851-8029

Rosemary M. Rivas (SBN 209147)
rrivas@finkelsteinthompson.com
FINKELSTEIN THOMPSON LLP
100 Bush Street, Suite 1450
San Francisco, California 94104
Telephone: (415) 398-8700
Facsimile: (415) 398-8704

J. Paul Gignac (SBN 125676)
j.paul@aogllp.com
ARIAS OZZELLO & GIGNAC LLP
4050 Calle Real, Suite 130
Santa Barbara, California 93110
Telephone: (805) 683-7400
Facsimile: (805) 683-7401

Proposed Interim Co-Lead Class Counsel

Proposed Interim Liaison Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

**IN RE FACEBOOK PPC ADVERTISING
LITIGATION**

**This Document Relates To:
All Actions.**

Master File No. C 09-03043 JF

**JOINT STIPULATION AND
[PROPOSED ORDER] TO CONTINUE
CASE MANAGEMENT
CONFERENCE**

Current Date: November 13, 2009
Proposed Date: December 18, 2009
Time: 9:00 a.m.

Courtroom: 3, 5th Floor
Judge: Honorable Jeremy Fogel

1 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6-2, Plaintiffs and
2 Defendant, Facebook, Inc., through their undersigned counsel, stipulate as follows:

3 WHEREAS, on October 19, 2009, an Initial Case Management Conference was
4 set for November 13, 2009;

5 WHEREAS, on October 27, Plaintiffs filed a Motion for Lead Counsel Pursuant to
6 Rule 23(g) of the Federal Rules of Civil Procedure which will be heard by the Court on December
7 18, 2009;

8 WHEREAS, in order to conserve judicial and the parties' resources, the parties
9 agree that a continuance of the Case Management Conference to December 18, 2009 – the same
10 date as the Motion for Lead Counsel – is appropriate.

11 Subject to the Court's approval. Plaintiffs and Defendant, FACEBOOK, hereby
12 stipulate and agreed pursuant to Northern District of California Civil Local Rule 6-2, as follows:

13
14 1. The last date for the parties to meet and confer re: initial disclosures, early
15 settlement, ADR process selection and discovery plan pursuant to Federal Rule of Civil
16 Procedure 26(f) shall be extended through November 25, 2009.

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18 2. The last date for the parties to file a Joint ADR Certification with Stipulation to
19 ADR Process or Notice of Need for ADR Phone Conference pursuant to Civil L.R. 16-8 shall be
20 extended through November 25, 2009.

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22 3. The last date for the parties to file a Rule 26(f) Report, complete initial disclosures
23 or state objection in Rule 26(f) Report and file Case Management Statement shall be extended
through December 11, 2009.

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25 4. The Initial Case Management Conference scheduled for November 13, 2009 shall
26 be continued to December 18, 2009 at 9:00 a.m.

Respectfully Submitted,

DATED: November 2, 2009

SEEGER WEISS LLP

By: /s/ Jonathan Shub
JONATHAN SHUB

Attorneys for Plaintiffs

ORRICK, HERRINGTON & SUTCLIFFE LLP

DATED: November 2, 2009

By: /s/ Angela L. Padilla
ANGELA L. PADILLA

Counsel for Defendant FACEBOOK INC.

I attest that concurrence in the filing of this document has been obtained from Angela Padilla for Defendant.

By: /s/ Jonathan Shub
Jonathan Shub
Attorney for Plaintiffs

1 **[PROPOSED] ORDER**

2 Pursuant to the Stipulation and counsel and for good cause shown, IT IS HEREBY
3 ORDERED that:
4

5 1. The last date for the parties to meet and confer re: initial disclosures, early
6 settlement, ADR process selection and discovery plan pursuant to Federal Rule of Civil
7 Procedure 26(f) shall be extended through November 25, 2009.

8 2. The last date for the parties to file a Joint ADR Certification with Stipulation to
9 ADR Process or Notice of Need for ADR Phone Conference pursuant to Civil L.R. 16-8 shall be
10 extended through November 25, 2009.
11

12 3. The last date for the parties to file a Rule 26(f) Report, complete initial disclosures
13 or state objection in Rule 26(f) Report and file Case Management Statement shall be extended
14 through December 11, 2009.

15 4. The Initial Case Management Conference scheduled for November 13, 2009 shall
16 be continued to December 18, 2009 at 9:00 a.m.
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18 IT IS SO ORDERED.

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20 Dated: 11/5, 2009
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Hon. Jeremy D. Fogel